REMARKS

Claims 1-14 were presented for examination. In the Office Action dated November 20, 2004, claims 1 and 8 were objected to, and claims 1-14 were rejected.

Applicants are hereby canceling claims 1-14. Applicants are hereby adding claims 15-53. These new claims add no new matter.

Applicants thank Examiner for examination of the claims. Applicants now request reconsideration in light of the below remarks and allowance of pending claims 15-53.

In paragraph 1 of the Office Action, Examiner objects to claims 1 and 8 because of informalities. Because claims 1 and 8 have been cancelled, the informalities no longer apply. Thus, Applicants submit that the objections are moot.

In paragraph 3 of the Office Action, Examiner rejects claims 1-14 under 35 U.S.C. §102(e) over U.S. Patent No. 6,640,278 issued to Nolan *et al.* ("Nolan"). Because claims 1-14 have been cancelled, the rejections rejection no longer apply to those claims. However, to the extent that new claims 15-53 contain similar limitations, Applicants submit that the rejection is likewise inapplicable since. In general, while the new claims recite the configuration of <u>logical capabilities</u>, Nolan merely discloses connecting <u>physical capabilities</u>.

Independent claim 15 recites a storage domain system to provide variable capabilities of a SAN (Storage Area Network). More specifically, a storage domain configures logical aspects to operate separately from physical aspects of storage device capabilities. The storage domain configures the logical aspects according to needs of the host. Furthermore, the storage domain is capable of spanning across several storage domain servers. Advantageously, the storage domain can discriminate physical resource allocation between hosts that conduct transactions with the SAN. For example, one group of hosts or users can be given I/O bandwidth priority over another group of hosts or users. Moreover, physical aspects are transparent to the host.

By contrast, Nolan discloses connecting <u>physical capabilities</u> of the SAN with clients in a rudimentary manner for the purpose of centralization. In particular, Nolan primarily teaches the use of a hardware device to configure a so-called 'storage domain' ("the system according to the present invention is included as an intermediate device in a storage area network, between client processors, such as file servers, and storage systems used as storage resources in a storage domain for clients" 2:42-46). The so-called 'storage domains' assign so-called 'logical storage extents' to clients within the network (2:57-60). Applicants note that notwithstanding the use of similar terminology, and thus the usage of 'so-called', Nolan discloses just an intermediary device.

However, Nolan fails to disclose or suggest configurable <u>logical capabilities</u> as recited in claim 15. While a storage domain of claim 15 is able to, for example, provide one host with more I/O bandwidth than another host with respect to the same storage device, Nolan merely passes data over a virtual circuit without regard to discriminate allocation. Indeed, at its highest logical level, Nolan discloses a user interface to map exported LUNs (Logical Unit Numbers) to resources (see FIGs. 18-26). But LUNs only provide direct mapping of physical resources (see listed data options 24:45-64). There is no way in Nolan to further configure logical capabilities of the connected physical resources.

Therefore, Applicant submits that claim 15 is patent able over Nolan either alone or in combination with other prior art of record. Claims 30, 31, and 46 have similar limitations, and thus, are patentable for the same reasons. Moreover, because claims 16-29, 32-45, and 47-58 depend from patentable independent claims in addition to claiming additional novel features, they are patentable for at least the same reasons.
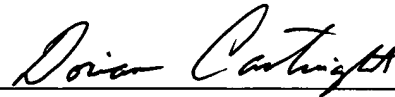
Conclusion

In sum, Applicants respectfully submit that claims 15-53, as presented herein, are patentably distinguishable over Nolan and/or the other cited references. Therefore, Applicant requests reconsideration and allowance of these claims.

In addition, Applicants respectfully invites Examiner to contact Applicants' representative at the number provided below if Examiner believes it will help expedite furtherance of this application.

RESPECTFULLY SUBMITTED,
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